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ADMITTED IN
NY, NJ, PA, IL, DC

VIA ECF

Hon. Taryn A. Merkl, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Gonzalez v. BBKM Associates LLC d/b/a Mirage Diner, et al.**
Case Number 20-cv-40 (DLI) (TAM)

Dear Magistrate Judge Merkl:

We represent plaintiff Crescenciano Gonzalez in the above-referenced matter, and we write to request a second extension of the deposition end date, which is set to expire on August 25. We previously requested an extension when we learned right before defendants' July 8 depositions that Mr. Drobenare would be unavailable for several weeks because he was about to undergo medical treatments. Recently, we attempted to contact Mr. Drobenare both by phone and by email to see if he is feeling up to depositions and whether he would consent to another extension for that purpose. As of this writing, however, we have not heard back from Mr. Drobenare.

The parties are scheduled for a telephone conference before Your Honor on August 26 at 11:00 a.m., and perhaps at that time, we can gauge counsel's condition and set a timetable for the completion of discovery. We thank the Court for its attention to this matter and are available at Your Honor's convenience should the Court have any questions regarding the foregoing.

Respectfully submitted,



David Stein

cc: Michael A. Drobenare, Esq. (via ECF)